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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Norfolk Division

IN RE: TERRI BROWN,
Debtor.

CASE NO.: 12-72788-SCS
Chapter 13

AMENDED MOTION TO MODIFY MORTGAGE LOAN

TO THE HONORABLE JUDGE STEVEN ST. JOHN:

COMES NOW Terri Brown, Debtor, by counsel and moves the Court for authority to modify her mortgage loan, and in support thereof states as follows:

- 1) Debtor filed a Chapter 7 Bankruptcy proceeding in this Court on June 28, 2012.
- 2) Debtor converted her case to a Chapter 13 on September 10, 2012.
- 2) Debtor filed her Chapter 13 Plan on November 29, 2012, the plan was confirmed on December 17, 2012.
- 3) Debtor desires to modify her current indebtedness by qualifying for a loan modification on his mortgage, the terms of which are as follows:
 - a. Debtor's first mortgage company, Navy Federal Credit Union, is offering to capitalize all arrearages and delinquent escrow through February 2013 into the principal of the loan.
 - b. The current principal balance, including the above arrearages, of the loan is \$325,886.59.
 - c. The effective date of the loan modification will be March 1, 2013.
 - d. Debtor's current mortgage payment is \$2,552.54.
 - e. The loan will consists of 371 payments and the maturity date of the loan will be February 1, 2043.
 - f. The interest rate will be 6.375% per year and remain in effect until principal and interest are paid in full.

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g. The Debtor's principal and interest payments will be \$1,204.54 and will be effective March 1, 2013.

h. Without the loan modification, Debtor will have no feasible way of catching up the mortgage arrears.

3) The legal description of the subject property, located at 2244 Natoma Drive, Virginia Beach, VA 23456 is as follows:

ALL THAT certain lot, piece or parcel of land, with the buildings and improvements thereon, lying, situate and being in the City of Virginia, Virginia and being known, numbered and designated as Lot 29, as shown on that certain plat entitled "BENTLEY PARK, PHASE ONE BEING A SUBDIVISION OF PARCEL "A" (M.B. 288 P. 38-39) VIRGINIA BEACH, VIRGINIA", made by The Spectra Group, dated August 9, 2000, which said plat is duly recorded in the Clerk's Office of the Circuit Court of the City of Virginia Beach, Virginia in Map Book 290, at pages 96 through 100.

TOGETHER WITH that certain fifty (50) foot ingress/egress easement over Parcel B as shown on the above mentioned subdivision plat.

IT BEING a portion of the same property which was conveyed to the Grantor herein by deed from Century Mark Development Group, L.L.C., a Virginia limited liability company, dated November 8, 2000 and recorded in the Clerk's Office of the Circuit Court of the City of Virginia Beach, Virginia, in the Deed Book 4326, at page 573

4) The Debtor believes that modifying her loan is necessary and proper, that the Debtor is able to repay that loan upon the terms set forth above, and that the purpose for modifying her loan is so that the Debtor will be able to be brought current on her arrearages, will have a lower interest rate, and lower monthly payments.

5) That Debtor will submit modified schedules I & J within 21 days of the approval of her loan modification and any other amendments as appropriate to commit all disposable income to the Plan. The mortgage payment in the

current schedule I was, as noted in the filing, based on a temporary trial modification.

- 6) Navy Federal Credit Union will file the proper pleadings withdraw its proof of claim for prepetition arrearages upon approval of her loan modification.

WHEREFORE, the Debtor respectfully requests that their Motion to Modify Loan be granted as requested and for the purposes described above.

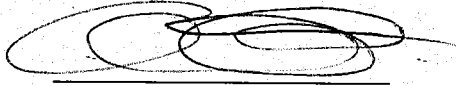
RESPECTFULLY SUBMITTED,

BY:


Amber L. Quick
Counsel for Debtor

CERTIFICATE OF MAILING

I certify that on March 14, 2013, I mailed a copy of the debtor's Amended Motion to Modify Mortgage Loan, to the creditors and parties in interest on the attached Service List in compliance with Fed.R.Bankr.P. 7004. Insured depository institutions have been served via certified mail addressed to the officer named on the attached service list. All other parties have been served via first class mail addressed as shown attached list.


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AMENDED NOTICE OF MOTION TO MODIFY MORTGAGE LOAN

The Debtor has filed papers with Court to Modify her Mortgage.

Your rights may be affected. You should read these papers carefully and discuss them with your Attorney, if you have one in their case. (If you do not have an Attorney, you may wish to consult one.)

If you do not want the Court to grant the Relief requested, or if you want the Court to consider your views on the Motion then, on or before April 3, 2013, you or your Attorney must file with the Court, at the address shown below, a written response pursuant to Local Bankruptcy Rules 4001(a)-1(C) and 9013-1 (H). You must mail your response to the Court for filing.

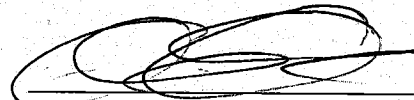
You must also mail a copy to:

Clerk of Court
United States Bankruptcy Court
600 Granby Street, Fourth Floor
Norfolk, VA 23510

Amber L. Quick
Law Office of Steve C. Taylor, P.C.
133 Mount Pleasant Road
Chesapeake, VA 23322


If you or your Attorney do not take the above step(s), the Court may decide you do not oppose the relief sought in the motion and may enter an Order granting the Motion without further notice or hearing.

Date: March 13, 2013


Amber L. Quick

CERTIFICATE OF MAILING

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